

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
(SAN FRANCISCO DIVISION)

IN RE: VIAGRA (SILDENAFIL CITRATE)  
AND CIALIS (TADALAFIL) PRODUCTS  
LIABILITY LITIGATION

Case No.: 3:16-md-02691-RS  
MDL No. 2691

Case No:

ROGER KREGE,

**Master Short Form Complaint**

Plaintiff,

v.

PFIZER INC.,

Defendant.

Plaintiff, ROGER KREGE, incorporates by reference the Plaintiffs' Master Long Form Complaint(s) filed with United States District Court for the Northern District of California in the matter of *In re: Viagra (Sildenafil Citrate) and Cialis (Tadalafil) Products Liability Litigation*. Plaintiff further shows the court as follows:

1. Defendant(s) against whom Complaint is made:

a. \_\_\_ Eli Lilly and Company

b. X Pfizer Inc.

c. \_\_\_ Other (specify Defendant) \_\_\_\_\_

2. Plaintiff's Full Name:

a. Roger Krege

3. Name of the party or deceased who ingested Viagra/Revatio (sildenafil citrate) (hereinafter "Viagra") and/or Cialis/Adcirca (tadalafil) (hereinafter "Cialis") and suffered injury, if different than Plaintiff:

a. N/A

4. Name of additional or other Plaintiff, including loss of consortium Plaintiff(s) (i.e. administrator, executor, guardian, conservator):

a. N/A

5. Plaintiff's current city and state of residence:

a. Joplin, Missouri

6. District Court in which venue would be proper absent direct filing:

a. Western District of Missouri

7. City and state of Plaintiff or Decedent when he/she was diagnosed with melanoma:

a. Joplin, Missouri

8. Approximate dates that the Plaintiff or Decedent ingested Viagra (if applicable):

a. Start date: 06/08/2012

b. Stop date: 07/08/2012

9. Approximate dates that the Plaintiff or decedent ingested Cialis (if applicable):

a. Start date: N/A

b. Stop date: N/A

10. Date(s) that Plaintiff was diagnosed with melanoma which he/she alleges was caused by Viagra and/or Cialis:

a. 01/01/2016

11. Date of death of Decedent, if applicable:

a. N/A

12. Master Complaint Adopted (check one or both):

a. ☒ Pfizer Master Complaint

b. ☐ Eli Lilly Master Complaint

13. Counts in the Master Complaint(s) brought by Plaintiff(s):

a. Count 1 (Negligence): ☒

b. Count 2 (Gross Negligence): ☒

c. Count 3 (Negligence Per Se): ☒

20 a. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff(s) hereby demand a trial  
21 by jury as to all claims in this action: Yes X No \_\_\_\_

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Respectfully submitted on behalf of the Plaintiff,



Jennifer Liakos (CA SBN 207487)

Hunter J. Shkolnik (*Pro Hac Vice Pending*)

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